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September 10, 2004

Chairman Pat Miller
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Sprint's Responses to Consumer Advocate and Protection Division's Second Set
of Discovery Requests Regarding Primary Rate ISDN Service
Docket No. 03-00391, Exemption of Certain Services

Dear Chairman Miller:

Enclosed for filing in the above-referenced proceeding are the original and thirteen (13) copies of United Telephone-Southeast, Inc.'s Responses to Consumer Advocate and Protection Division's Second Set of Discovery Requests Regarding Primary Rate ISDN Service.

Copies of United's Responses are being served upon all parties of record in this proceeding. If I can be of assistance, please call me at your convenience.

Sincerely yours,

Edward Phillips

HEP:sm

Enclosures

cc: All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of United Telephone-Southeast, Inc.'s Responses to Consumer Advocate and Protection Division's Second Set of Discovery Requests Regarding Primary Rate ISDN Service upon all parties of record to this Docket by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

This 10th day of September, 2004.

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Street, #1600
Nashville, TN 37219-8062

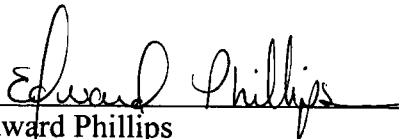
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Edward Phillips
United Telephone-Southeast, Inc.

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In Re:)	
)	
Petition of BellSouth Telecommunications, Inc. for)	Docket No. 03-00391
Exemption of Certain Services)	
)	

**SPRINT'S RESPONSES TO CONSUMER ADVOCATE AND PROTECTION
DIVISION'S SECOND SET OF DISCOVERY REQUESTS
REGARDING PRIMARY RATE ISDN SERVICE**

United Telephone-Southeast, Inc. ("Sprint") by and through undersigned counsel, hereby submit Sprint's Responses to the Consumer Advocate and Protection Division's Second Set of Discovery Requests Regarding Primary Rate ISDN Service Propounded to United Telephone-Southeast, Inc.

Interrogatory No. 1

In the Company's response to Interrogatory No. 2 of the First Discovery Requests, the Company identifies "MountaiNet" as a competitor. Is "MountaiNet" a certificated Tennessee CLEC or a reseller of the Company's services?

Response:

It is Sprint's understanding that MountaiNet Telephone Company ("MountaiNet") received a CLEC certificate in Authority Docket No. 02-00446. In addition, MountaiNet had a collocation agreement with Sprint approved in Docket No. 02-01281, and currently has in place a

master interconnection and resale agreement with Sprint, which was approved by the Authority in Docket No. 03-00115.

Interrogatory No. 2

In the Company's response to Interrogatory No. 18 of the First Discovery Requests, the Company "estimates it loses more than 50% of head-to-head bids to KMC." Provide the basis for the Company's estimation as well as the business and technical reasons for the Company's estimation.

Response:

The estimation of the level of competition Sprint faces from KMC is derived from a Sprint sales representative located in Bristol, Tennessee relating first hand knowledge of the sales opportunities in Northeast Tennessee.

Interrogatory No. 3

Provide a summary for every CSA offering PRI-ISDN in Tennessee. The summary should provide tariff rates, quantities, contract rates and tariff costs by USOC.

Response:

A copy of all Sprint CSAs have either been provided to the CAPD (1999-2003) or are publicly available (2004). Sprint does not have "USOCs."

Interrogatory No. 4

Describe in detail the market conditions requiring an increase in rates for PRI ISDN in Tennessee.

Response:

Sprint objects to this interrogatory as it assumes facts that do not exist in this proceeding. Specifically, the interrogatory incorrectly assumes that Sprint believes market conditions require an increase in the rates for ISDN-PRI in Tennessee. Sprint does not so believe.

Without waiving its objection, Sprint states that the issue in this case is whether existing and potential competition for ISDN-PRI service is an effective regulator of its price, not whether Sprint's ISDN-PRI service deserves a price increase.

Interrogatory No. 5

Does United plan to increase rates for an USOC necessary in the provision of PRI ISDN in Tennessee over the next five years?

Response:

Sprint does not have any present plans to increase rates for ISDN-PRI service over the next five years. See also Sprint's response to Interrogatory No. 20 from the CAPD's First Set of Discovery Requests filed with the Authority on August 18, 2004. However, five years is a length of time beyond which Sprint can make any reasonable statements or predictions about its pricing for a service such as ISDN-PRI given competitive concerns and the rapidity of technological change. Finally, Sprint does not have "USOCs."

Interrogatory No. 6

Provide the date and amount of all rate reductions made under T.C.A. § 67-6-222 (Ad Valorem Tax Reduction Fund) for each USOC related to the provision of PRI ISDN.

Response:

Sprint's rate reductions associated with Tenn. Code Ann. § 67-6-222 have not affected prices for ISDN-PRI. Finally, as noted in Sprint's response to Interrogatory No. 5, Sprint does not have "USOCs."

Interrogatory No. 7

Does the Company contend that its costs for the provision of PRI ISDN in Tennessee is greater than its competitors' costs for the provision of PRI ISDN in Tennessee? If so, state the basis for this contention and describe the conditions contributing to the competitors' lower costs for the provision of PRI ISDN in Tennessee.

Response:

Sprint objects to this Interrogatory as it has no specific knowledge as to the level of our competitors' costs and, therefore, does not take the position its costs to provide ISDN-PRI are greater than those of Sprint's competitors.

Interrogatory No. 8

For each PRI ISDN service identified in response to Interrogatory No. 7 of the first set of discovery requests, set forth the quantity of service provisioned to resellers of such service in Tennessee as of the following dates, as applicable (1) January 1, 1999; (2) June 30, 1999 (3)

January 1, 2000; (4) June 30, 2000; (5) January 1, 2001; (6) June 30, 2001; (7) January 1, 2002; (8) June 30, 2002; (9) January 1, 2003; (10) June 30, 2003; (11) January 1, 2004; and (12) June 30, 2004.

Response:

Sprint's Price Regulation filing made in October of each year includes June 30th units for the quantity of all ISDN-PRI rate elements resold to CLECs. The CAPD is copied on these filings.

Interrogatory No. 9

Does United advertise and market their PRI ISDN service in Tennessee? Is so, provide the advertising and marketing expenses incurred for PRI ISDN services in Tennessee for the years ended 1999-2003 by year.

Response:

Sprint advertises its business solutions both nationally and locally. Sprint markets its business solutions locally by way of area sales representatives. Sprint does not believe it has a single advertisement or area sales representative focused upon, or dedicated to, exclusively selling or marketing ISDN-PRI services.

Interrogatory No. 10

If an exemption were granted to the Company for PRI ISDN services and the Company decided to raise its rates for PRI ISDN, the is it likely that the Company's competitors would increase their PRI ISDN rates? If not, why not?

Response:

Refer to Sprint's response to Interrogatory No. 20 in the CAPD's First Set of Discovery Requests and Sprint's responses to Interrogatory Nos. 4 and 5 above regarding price increases. Further, any specific answer to this Interrogatory is objectionable as it calls for speculation on Sprint's behalf as to the pricing decisions of Sprint's competitors.

Request for Production No. 1

Provide all documents, communications, and correspondence discussing any rate increase related to the provisioning of PRI ISDN in Tennessee.

Response:

Sprint raised rates for selected month-to-month ISDN-PRI recurring rate elements effective January 10, 2002. This tariff filing was provided to the CAPD. Sprint cannot currently find any additional documents discussing this rate increase.

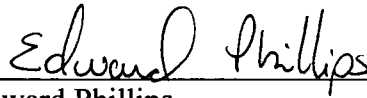
Request for Production No. 2

Provide documents and communications relating to all cost studies performed by United for the provision of PRI ISDN in Tennessee.

Response:

The CAPD has already been provided copies of Sprint's initial ISDN-PRI tariff filing (with related cost study) and copies of Sprint's ISDN-PRI related CSAs (with related cost studies). Sprint is not aware of other documents relating to specific cost studies of Sprint's ISDN-PRI services in Tennessee.

Respectfully submitted this 10th day of September, 2004.



Edward Phillips

Attorney

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